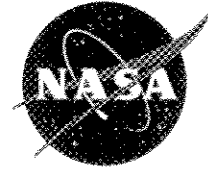


National Aeronautics and Space Administration  
**Headquarters**  
Washington, DC 20546-0001



December 7, 2009

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at the Lockheed Martin 2009  
Holiday Reception on December 8, 2009

On December 8, 2009, Lockheed Martin Corporation, will host a holiday reception at the Phoenix Park Hotel on Capitol Hill in Washington, D.C. The reception will be from 6:00p.m.- 8:30 p.m.

Approximately 400 people have been invited and are expected to attend. The estimated cost of the reception which includes all food and beverages, is \$138.00 per person. The reception will be attended by NASA personnel, representatives of the aerospace industry, trade associations, the media, members of Congress and congressional staffers, academia, and employees of other Federal agencies.

I find that the Lockheed Martin reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the reception will allow NASA personnel to meet and discuss the space program with a wide-range of people from industry, Congress, and other Federal agencies.

Accordingly, NASA employees whose duties do not substantially affect the event sponsor may accept an invitation for free attendance to the reception for themselves and their guests. However, NASA employees whose duties may substantially affect event sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

Moreover, NASA employees who are in non-career positions in which Executive Order 13490, requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of the reception for themselves and any accompanying guest.

*for Adam F. Greenstone*  
Adam F. Greenstone